

1 RANDY SUE POLLOCK
2 Attorney at Law (CSBN 64473)
2831 Telegraph Avenue
3 Oakland, CA 94609
3 San Francisco, CA 94109
4 Telephone: (510) 763-9967
4 Facsimile: (510) 272-0711

5 Attorney for Defendant
6 STEVEN JOHN BARNES
7
8

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ooo

UNITED STATES OF AMERICA,
Plaintiff,

CR. 07-0300-JSW

vs.

STEVEN JOHN BARNES, et al.,
Defendant.

**STIPULATION TO CONTINUE
STATUS CONFERENCE**

Defendant STEVEN JOHN BARNES, by and through his counsel of record Randy Sue Pollock, and Assistant U.S. Attorney Shawna Yen, I hereby stipulate and agree that the status conference presently set for Thursday, November 15, 2007 be continued to December 20, 2007. This continuance is necessary so that counsel's computer expert can evaluate the discovery in this case.

The expert, Dr. Robert Young, was retained last month however because of his other professional commitments he will be unable to review the discovery until mid-November. Once he reviews the discovery and consults with defense counsel, additional time will be needed in order to meet and confer with the prosecutor regarding a possible disposition.

1 The time period from November 15, 2007, to December 20, 2007 would be
2 deemed excludable pursuant to 18 U.S.C. Section 3161(h)(8)(A), given that the ends of
3 justice served by granting a continuance outweigh the best interests of the public and of
4 the defendant in a speedy trial. Additionally, pursuant to 18 U.S.C. Section
5 3161(h)(8)(B)(ii) given the nature and complexity of the prosecution and the volume of
6 the evidence, it is unreasonable to expect adequate preparation for pretrial proceedings
7 and for the trial within the time limits established by the Speedy Trial Act.

8

9

10 Date: November 9, 2007

/s/ Randy Sue Pollock
RANDY SUE POLLOCK
Counsel for Defendant
Steven John Barnes

11

12

13

14 Date: November 9, 2007

/s/ Shawna Yen
SHAWNA YEN
Assistant United States Attorney

15

16

17

18 SO ORDERED:

19 November____, 2007

20 JEFFREY S. WHITE
United States District Court Judge